

UNITED STATES DISTRICT COURT
NORTHER DISTRICT OF ILLINOIS
EASTERN DIVISION

NEXT Payment Solutions, Inc.,

Plaintiff,

v.

CLEAResult Consulting, Inc.,

Defendant.

Case No. 17 CV 8829

DEFENDANT’S MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rule 5.8, Defendant CLEAResult Consulting Inc. hereby moves this Court for leave to file under seal Exhibits 1, 3, 4 and 5 appended to the Declaration of J. Matthew Donohue in Support of Defendant’s Motion in Limine to Exclude Argument or Evidence in Support of an Unjust Enrichment Claim Premised on Proprietary Information (“September 8 Motion in Limine”). In support of its motion, CLEAResult states as follows:

1. On May 16, 2018, this Court entered an Agreed Confidentiality Order (“Order”) that is in effect. (Dkt. No. 74.)

2. Plaintiff NEXT Payment Solutions, Inc. and CLEAResult have designated various documents and deposition testimony as Confidential in this matter pursuant to that Order.

3. Parts of the documents and deposition testimony designated as Confidential form the basis for CLEAResult’s September 8 Motion in Limine and are attached to the declaration of J. Matthew Donohue.

4. Specifically, Exhibits 1, 3, 4 and 5 were designated confidential by NEXT (and Exhibits 3 and 4 contain confidential information pertaining to CLEAResult’s customers and

revenue).

5. Pursuant to Local Rule 26.2, CLEAResult has electronically filed unredacted versions of Exhibits 1, 3, 4, and 5 under seal.

WHEREFORE, for the foregoing reasons, CLEAResult respectfully requests that this Court grant it leave to file under seal Exhibits 1, 3, 4, and 5 to the Declaration of J. Matthew Donohue in Support of the September 8 Motion in Limine.

Dated this 8th day of September, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing DEFENDANT'S MOTION FOR LEAVE TO FILE UNDER SEAL to be served on the following person[s]:

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by CM/ECF electronically mailed notice from the Court on the date set forth below.

DATED September 8, 2021.

s/J. Matthew Donohue
J. Matthew Donohue